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Counsel for Virginia Surety Company, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,)	Case No. 18-23538 (RDD)
)	
Debtors.)	
)	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL NOTICES

PLEASE TAKE NOTICE THAT, Curtis L. Tuggle of the law firm Thompson Hine LLP hereby enters his appearance for and on behalf of Virginia Surety Company, Inc. (“VSC”) in the above-captioned case and requests that copies of all notices, pleadings and other papers filed in the case be served upon:

Curtis L. Tuggle, Esq.
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The foregoing request includes notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests, or petitions, answering or reply papers, memoranda, briefs and any other document brought before this Court with respect to these proceedings,

whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, facsimile, telephone, telegraph, telex or otherwise.

PLEASE TAKE FURTHER NOTICE THAT, this Notice of Appearance and Request for Service of Papers shall not be deemed to be a waiver of VSC's right (i) to have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (v) to any other rights, claims, actions, defenses, setoffs, or recoupments to which VSC is or may be entitled under agreements in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments VSC expressly reserves.

Dated: October 23, 2018

Respectfully submitted,

/s/ Curtis L. Tuggle

Curtis L. Tuggle (5149141)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 23rd day of October, 2018, he caused a true and correct copy of the foregoing Notice of Appearance to be served electronically on those parties requesting electronic service through the Court's EFC system and by regular U.S. Mail, postage prepaid, to the individuals and entities listed in the Master Service List, attached hereto as Exhibit A.

/s/ Curtis L. Tuggle
Curtis L. Tuggle